

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS MEREWITZ
(USPS/FGFSA-T1-56-65)

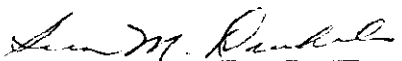
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Florida Gift Fruit Shippers Association witness Merewitz: USPS/FGFSA-T1-56-65.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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February 3, 1998

USPS/FGFSA-T1-56. The file dropsh~1.wb3 in Library Reference LAM-H-1 contains what appears to be the source information for Exhibit LAM-6. Included in this file is a reference to the file dropship.incr.purch2.wb3. Please provide this file.

USPS/FGFSA-T1-57. Please refer to the file dropsh~1.wb3 in Library Reference LAM-H-1. In that file the number 50,354.1 appears as a measure of Bulk Rate Regular volume in FY 1991. The spreadsheet further indicates that this number was developed using the 1991 billing determinants. Please provide all source data and the actual calculation used to produce this number, and indicate the subclass and mail category of the source data and the units of measurement (e.g., pieces, weight).

USPS/FGFSA-T1-58. For all other numbers in dropsh~1.wb3 in Library Reference LAM-H-1 that are sourced to the 1996 and 1991 billing determinants, please provide the same information as requested in interrogatory USPS/FGFSA-T1-57.

USPS/FGFSA-T1-59. Please refer to dropsh~1.wb3 in Library Reference LAM-H-1.

- a. Please confirm that you developed volume of mail not dropshipped beyond the BMC for FY 1996. If not confirmed,

please explain fully.

- b. Please confirm that this calculation includes the subtraction of single piece Standard A volume from bulk Standard A volume. If not confirmed, please explain fully.
- c. Is it your understanding that single piece volume is included in bulk volume? Please explain fully.

USPS/FGFSA-T1-60. Please refer to MA-6. Please confirm that the volumes shown do not include volumes of nonprofit mail regular rate, Nonprofit standard A or Nonprofit enhanced carrier route.

USPS/FGFSA-T1-61. Please refer to LAM-6.

- a. Please indicate whether the workload you refer to on page 2 includes any accounting for the distance the mail travelled in either 1991 or 1996.
- b. Is it your understanding that transportation workload should not include a measure of distance travelled? Please explain fully.

USPS/FGFSA-T1-62. Please refer to Library Reference LAM-H-1, file LAM13.wb3.

- a. Please explain where in your testimony this file is used.
- b. Please provide the source code noted in the spreadsheet as

"Source: Running of Postal Service SAS Model in Lib. Ref. H-82 and H-84, y96a11."

USPS/FGFSA-T1-63. Please refer to Library Reference LAM-H-1, file LAM3REV.wb3.

- a. Please explain where and how in your testimony this library reference is used.
- b. Please also provide the SAS code used to construct this file.

USPS/FGFSA-T1-64. Please refer to Library Reference LAM-H-1, file LAM4B~1.wb3.

- a. Please confirm that this file underlies the calculations shown in Exhibit LAM-4b.
- b. Please confirm that the cubic feet of Standard A mail (136,980 and 395,797) in panel B are developed using a calculation that multiplies weight by cubic feet per pound.
- c. Please confirm that the calculation described in subpart (b) above is not included in the file provided.
- d. Please provide the explicit calculation of the numbers referred to in subpart (b) above.
- e. Please provide the units of measure (e.g., thousands, millions) for these two numbers and all other numbers shown in

LAM4B~1.wb3.

- f. LAM4b~1.wb3 contains a reference to C:\myfiles\contr1.est.wb3.

Please provide this file.

USPS/FGFSA-T1-65. Please refer to Library Reference LAM-H-1, file QURTPU~1.Wb3.

- a. Please confirm that this file was used to create LAM-2a.
- b. Please confirm that this file (and LAM-2b) show only accrued costs for intra and inter BMC accounts.
- c. Please confirm that footnote (c) in LAM-2a and in the file on which it is based refers to nothing in the Exhibit or the file.
- Please explain footnote (c) fully.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


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